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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

JEREMIAH COOK, an individual,

Plaintiff,

v.

TEQUILA THURMAN in her individual capacity, **CARRIE HUTCHISON** in her individual capacity, and **RYAN LUFKIN** in his individual capacity,

Defendants.

Case No. 3:24-cv-01481-AB

**UNOPPOSED MOTION FOR
EXTENSION OF DEADLINES**

Pursuant to Rule 6(b) of the Fed. R. Civ. P., Defendant Thurman hereby moves the court for an order modifying the scheduling order and allowing an extension of time of deadlines in this case. Counsel for Defendant Thurman has conferred with counsel for Plaintiff Cook and Defendants Hutchison and Lufkin, and this motion is unopposed.

Specifically, Defendant Thurman requests an extension of time for the following deadlines:

Deadline Description	Current Date	Proposed Date
Add parties/Amend Complaint	04/01/25	06/02/25
Discovery	05/01/25	06/30/25
Joint ADR Report	05/15/25	07/14/25

Dispositive Motions	06/01/25	07/25/25
Oral Argument on Dispositive Motions	08/04/25	09/08/25 or after
Expert Disclosure and Reports	30 days from ruling on dispositive motions	7/01/2025
Exchange of Expert Rebuttal Reports	14 days after Expert Reports	14 days after Expert Reports
Expert Discovery Deadline	30 days after Expert Reports	45 days after Expert reports
Pretrial Order	11/07/25	Keep Same
Pretrial Conference	12/08/25	Keep same
3-day Jury Trial	12/16/25	Keep same

This motion is based upon the complete court file and upon the declaration of Michael K. Porter, filed herewith.

DATED: April 9, 2025

Respectfully submitted,

/s/ Michael K. Porter

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